

MOBILE RELAY ASSOCIATES, LLC
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February 23, 2018

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

Re: Mobile Relay Associates, FRN 0001532027
Annual 64.2009(e) CPNI Certification for
Calendar Year 2017; EB Docket No. 06-36

Dear Ms. Dortch:

Mobile Relay Associates and its affiliated companies (collectively hereafter, "MRA") provide only Private Mobile Radio Service ("PMRS") to business subscribers. MRA provides no Commercial Mobile Radio Service ("CMRS"), as that term is defined is defined by the FCC. MRA does not provide any service to any subscriber involving interconnection to the Public Switched Telephone Network ("PSTN"). MRA does not obtain telephone numbers from the North American Numbering Plan Administrator ("NANPA"), and does not assign numbers to its PMRS fleet-dispatch subscribers. A subscriber of MRA, for example, a taxicab company, can communicate only among its own fleet of taxicabs and not with any other point. Indeed, the mobile and portable handsets issued to MRA subscribers do not even have dial pads.

In sum, MRA is not a telecommunications carrier. MRA has no USAC Filer identification number because MRA is not a telecommunications carrier and is not required to file Form 499A.

Moreover, MRA does not offer "telecommunications service," as defined in Section 3 of the Communications Act of 1934 as amended ("Act"), 47 U.S.C. §153, and therefore does not fall within the purview of Section 222 of the Act, 47 U.S.C. §222. MRA's customers/subscribers consist of entities (*e.g.*, corporations, LLCs, government agencies) with vehicle fleets (*e.g.*, taxis, buses, cement trucks, delivery vehicles), not members of the public. Nevertheless, because MRA's trade association, EWA, has suggested doing so out of an abundance of caution, MRA is filing this CPNI certification, in case the Commission should determine in the future that its rules on CPNI apply to PMRS entities such as MRA.

This statement is to certify that MRA has not and does not sell any customer information to anyone or to any company. MRA keeps all customer information and records, both paper and electronic, in a secure location. Access to this location and the information stored there is strictly limited to a few authorized personnel of MRA, each of whom has been trained in the need to maintain the strictest security respecting customer proprietary information.

MRA has trained all personnel to maintain customer records as proprietary information and to not share information with any outside parties. Attached to this certificate is a copy of MRA's written policy regarding the procedures to be employed for the protection of customer information. MRA has distributed a copy of this written policy to all personnel.

MRA did not take any actions against data brokers between January 1, 2017, and the date of this letter. Also, MRA has never received any customer complaints concerning the unauthorized release of CPNI.

I, the undersigned, hereby certify under penalty of perjury that I am an officer of MRA and responsible for the preparation of this certificate and oversight of MRA's compliance with the CPNI rules. I further certify to the truth and accuracy of the information contained in this certificate, that I have personal knowledge of MRA's operating procedures, and that MRA has established operating procedures adequate to ensure compliance with the FCC's CPNI rules set forth in §§64.2001 *et seq.*



Mark J. Abrams
Managing Member

Attachment

CUSTOMER INFORMATION POLICY

To protect the proprietary and private information about our customers, Mobile Relay Associates has established this company policy regarding customer information:

1. All of the company's proprietary data bases, including that containing customer information, are password protected, and access to same is limited to authorized personnel only. Distribution of the password is limited to those authorized personnel. The password will be changed routinely and whenever an employee with access to such data bases leaves the company.
2. No customer information in any form is to be removed from the company's offices by employees or others. This includes computer printouts, handwritten information or notes, photocopies of files or documents or copies in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the company.
3. Employees are to closely guard customer lists, contact information, telephone numbers, mobile code lists and all other customer information, both proprietary and public, to prevent any information from being removed from our offices by non-employees, either accidentally or intentionally. Only a few authorized employees will have access to this information.
4. The notes a salesperson may make about a customer to assist in a sale must be returned to the company's office and re-filed or shredded.
5. Internal documents, notes made when customers call in, and anything containing customer names and telephone numbers must be filed or shredded at the end of the business day.
6. There will be no online access by customers whatsoever to customer proprietary information.
7. Each new customer is assigned to a sales representative, which representative then becomes responsible for dealings with that customer ("Sales Rep"). The Sales Rep meets personally with the customer's officer or employee responsible for maintaining communications among the vehicles in customer's fleet ("Customer Contact"), at the office of the Customer Contact, when establishing the customer relationship. The Sales Rep becomes familiar with the face and voice of the Customer Contact. After the commencement of provision of service to the customer's fleet, all further communications are between the Sales Rep and the Customer Contact.
8. Thereafter, no customer information is disclosed except by that Sales Rep to that Customer Contact, each time verifying the identity of the Customer Contact by either face recognition (if in person) or voice recognition (if via telephone). If there is any subsequent change in the identity of either the Sales Rep or the Customer Contact, no customer information can be disclosed until a replacement is named by MRA or the customer, as the case may be, and there is a new face-to-face meeting between the current Sales Rep and the current Customer Contact, on the premises of the customer (so that the Sales Rep can visually confirm that this new individual has indeed been named as the new Customer Contact).
9. Customer information is never to be used or disclosed to anyone, except as follows:
 - (a) to market the company's service offerings to which the customer already subscribes;
 - (b) to market the company's CPE;

- (c) to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
 - (d) to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
 - (e) to resolve specific customer questions about the customer's own account arising in the course of a telephone conversation between that customer and company's service representative, and then only after orally obtaining from the customer a limited, one-time authorization to use the customer's information for the duration of that phone call.
10. Disconnected or inactive customer files are to be retained for no more than three (3) years, and then shredded. Disconnected or inactive customer files are never to be placed in the trash unshredded. Customer database printouts are to be shredded when replaced by newer printouts.
11. Appropriate disciplinary action will be taken for any violations of this policy.